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September 8, 1995

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Hazardous Materials Management Division
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SUBJECT: Contract No.: DACW33-91-D-
0004 Delivery Order No.: 012
Final Site Inspection Prioritization Report
St. Johnsbury Dump
St. Johnsbury, Vermont
TDD No.: 9401-64-CCX
CERCLIS No.: VTD988366142

DOCUMENT NO.: 6101-012-ST-0420

Dear Mr. Schwer:

Two copies of the Final Site Inspection Prioritization Report for the St. Johnsbury Dump, in St. Johnsbury, Vermont are enclosed. If you have any comments or questions regarding this submittal, please contact me at (617) 742-2659.

Very truly yours,

CDM FEDERAL PROGRAMS CORPORATION

David L. Hill
Delivery Order Manager

DLH/ebw

Attachment

cc: Sharon Hayes, EPA Work Assignment Manager (letter only)
Mark Klitzke, CDM Federal Site Manager

Approved:

for Julia M. Nault
Boston Branch Manager

Final Site Inspection Prioritization Report

**St. Johnsbury Dump
St. Johnsbury, Vermont**

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY, Region I
Waste Management Division
Boston, MA**

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INTRODUCTION

CDM Federal Programs Corporation (CDM Federal), in coordination with the New England Division, U.S. Army Corps of Engineers (ACOE), was requested by the U.S. Environmental Protection Agency (EPA) Region I Waste Management Division to perform a Site Inspection Prioritization (SIP) of the St. Johnsbury Dump in St. Johnsbury, Vermont. Tasks were conducted in accordance with ACOE Contract No. DACW33-91-D-0004, the SIP scope of work dated April 28, 1994, and technical specifications provided by ACOE under Delivery Order No. 012, which was issued to CDM Federal on July 20, 1994. A Preliminary Assessment (PA) was prepared by the NUS Corporation Field Investigation Team (NUS/FIT) in September 1988. On the basis of the information provided in the PA report, the St. Johnsbury Dump Site Inspection was initiated. A Site Inspection (SI) report was prepared by NUS/FIT in February 1990. Updated information encountered during the SIP process is included in this report. Relevant text from the SI report is presented in this report in a smaller font.

Background information used in the generation of this report was obtained through file searches conducted at the Vermont Agency of Natural Resources (VTANR), Department of Environmental Conservation (DEC), telephone interviews with town officials, conversations with persons knowledgeable of the St. Johnsbury Dump property, and conversations with other federal, state, and local agencies. Additional information was collected during the CDM Federal onsite reconnaissance on October 12, 1994, and environmental sampling on December 7, 1994.

This package follows the guidelines developed under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended, commonly referred to as Superfund. However, these documents do not necessarily fulfill the requirements of other EPA regulations, such as those under the Resource Conservation and Recovery Act (RCRA), or other federal, state, or local regulations. SIPs are intended to provide a preliminary screening of sites to facilitate EPA's assignment of site priorities. They are limited efforts and are not intended to supersede more detailed investigations.

SITE DESCRIPTION

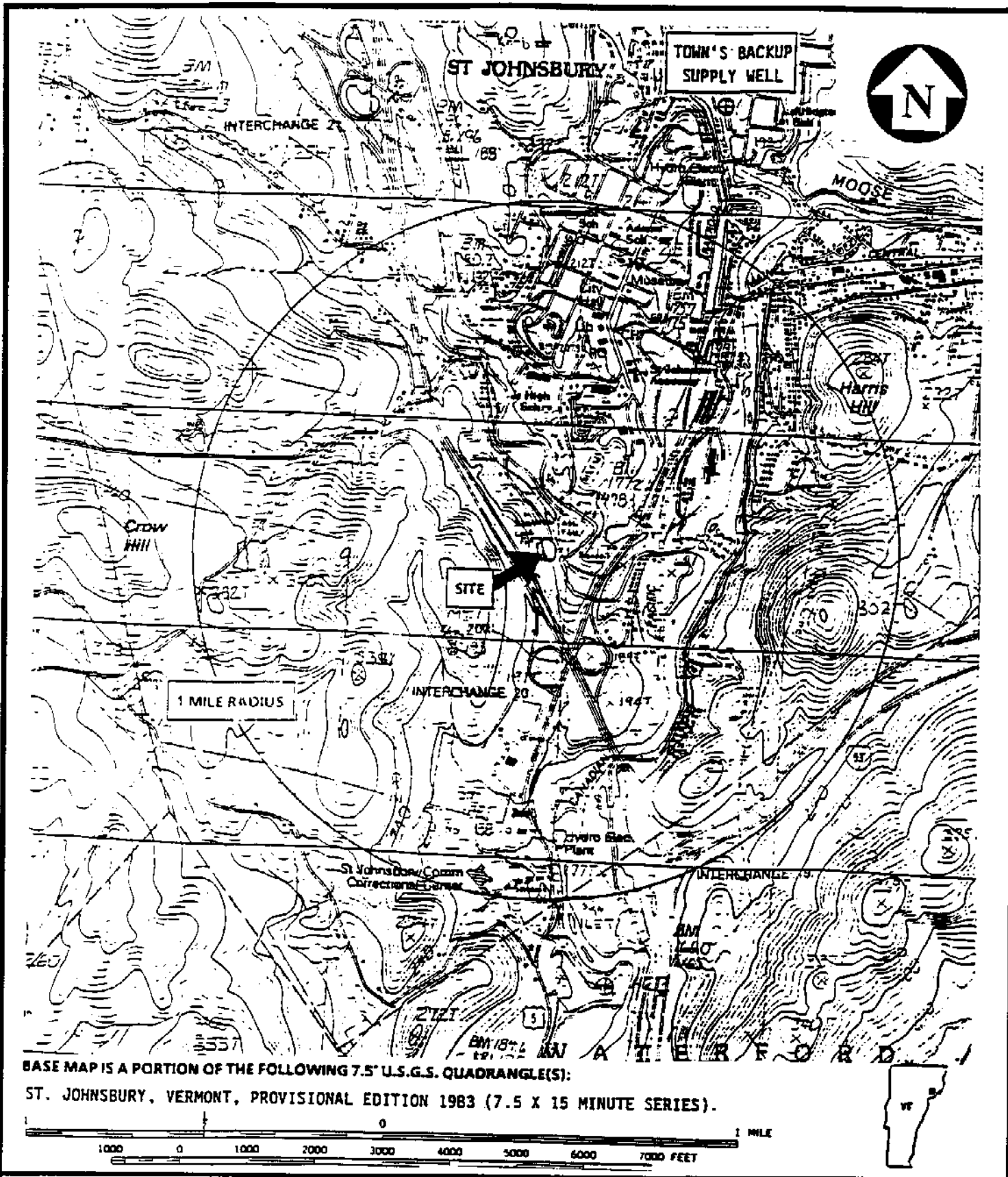
The St. Johnsbury Dump occupies approximately 4 acres in the municipality of St. Johnsbury, Caledonia County, Vermont. Currently closed, the dump is located directly adjacent to the Rapid Rubbish Removal transfer station at the end of High Street (geographic coordinates 44° 24' 36" N latitude; 72° 01' 35" W longitude). Other than the transfer station, there are no other active businesses on High Street [5]. The dump is bounded by the Sleepers River to the east, U.S. Route 5 and Interstate 91 to the south and west, and the Rapid Rubbish Removal transfer station to the north [5,11]. There are no buildings or paved areas on the property [5]. The dump is south of the former Fairbanks Morse Foundry property, an athletic field for the St. Johnsbury Academy, and a railroad line for the Lamoille Valley Railroad (see Figure 1; Location Map and Figure 2; Site Sketch) [5,11,18].

The dump accepted paint sludges, water soluble coolants, and electroplating sludge from a local industrial manufacturer, and household refuse from local residents. The dump is assumed to be unlined, "based on age and statewide general practice" [11]. There are no known monitoring wells on the property [5,11].

Dumping at the St. Johnsbury Dump is documented to have started prior to 1943 at a former "burning dump" located at the south end of High Street. The dump was expanded southward at least twice, once in 1963 and again in 1970. Cover and berm material for expanded portions of the dump are documented to have come from the former burning dump area of the St. Johnsbury Dump. The expanded portions of the dump were closed, covered with approximately 2 feet of soil, and seeded in 1975. Remnants of the former burning dump area are currently uncovered and exposed [5,8,11].

East of the former burning dump area is the Rapid Rubbish Removal transfer station. Leveling and grading operations in the southern portion of the transfer station have exposed a portion of the St. Johnsbury Dump. However, according to a partial property owner, and proprietor of Rapid Rubbish Removal, Inc., exposed refuse is subsequently covered with sand and gravel excavated from an onsite sand bank [5,11].

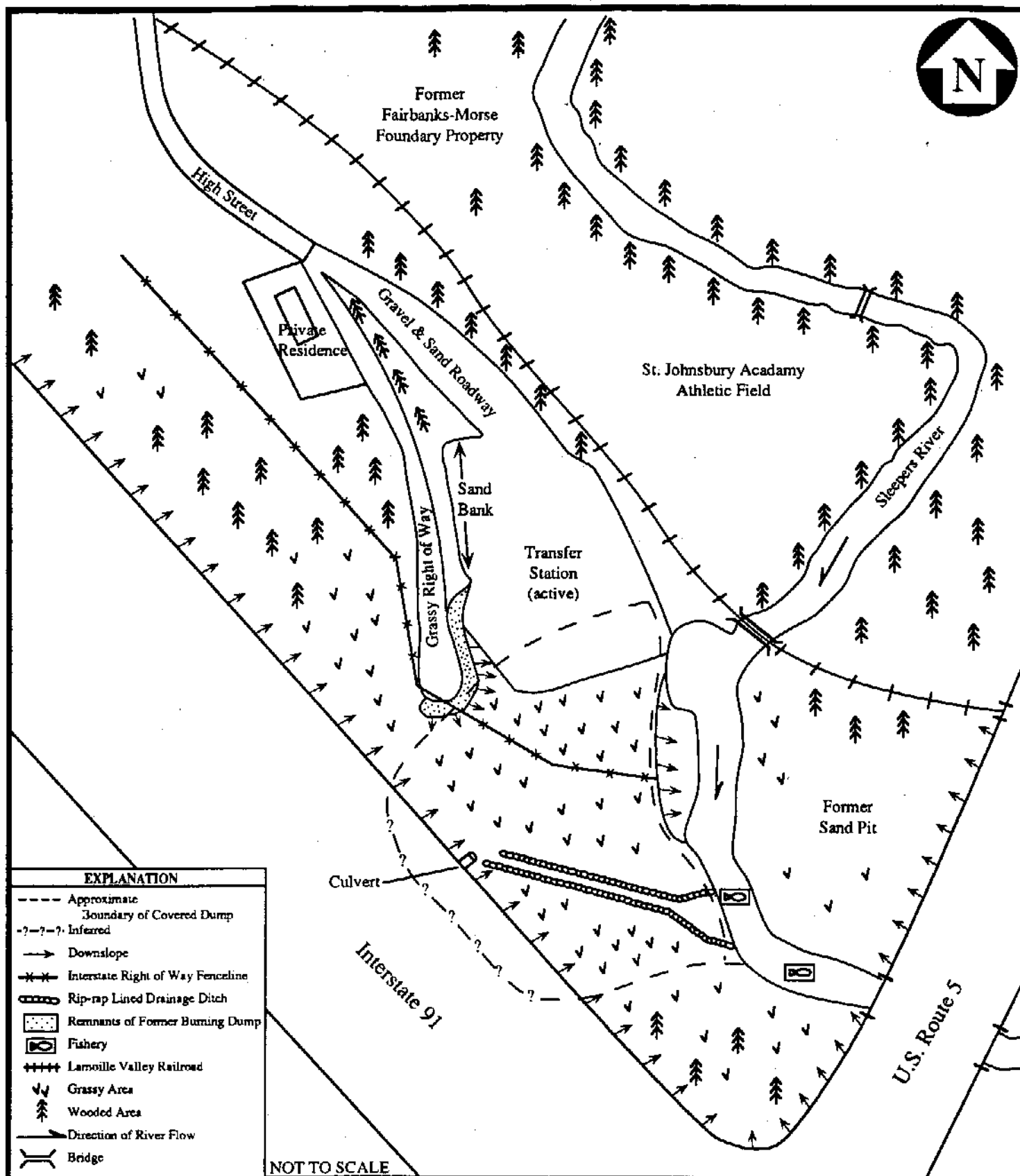
During an onsite reconnaissance of the St. Johnsbury Dump on October 12, 1994, CDM Federal observed refuse along a rip-rap-lined surface water drainage ditch that channels stormwater from a culvert beneath Interstate 91, through the dump, and into the Sleepers River [5,8]. The deeper pools in the Sleepers River, just north of the U.S. Route 5 overpass, are local fisheries [9]. The transfer station and residents on High Street are supplied with water from the St. Johnsbury municipal water supply [5].



LOCATION MAP
ST. JOHNSBURY DUMP
ST. JOHNSBURY, VERMONT

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Figure 1



SITE SKETCH
ST. JOHNSBURY DUMP
ST. JOHNSBURY, VERMONT

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Figure 2

OPERATIONAL AND REGULATORY HISTORY AND WASTE CHARACTERISTICS

Vermont Agency of Environmental Conservation (VT AEC) aerial photographs indicate the dump was in use prior to 1943 [8,11].

Landfill property, in addition to that already being used, was leased to the Town of St. Johnsbury in 1963 from Mr. Morton Lyster and the Fairbanks foundation for the purpose of maintaining and operating a sanitary landfill or "landfill dump" for public use. At a later time (year unknown) the State of Vermont also acquired ownership of portions of the Fairbanks Foundation land for the purpose of the construction of Interstate 91. As construction of the highway was not scheduled to begin until the mid 1970s, this land was leased to the Town of St. Johnsbury from 1970-1975 and was used for an extension of the original landfill as space had become very limited. The St. Johnsbury Dump operated as the town's municipal landfill from at least 1962 to 1975, accepting household refuse from the residents of St. Johnsbury until its closing in mid-1975. Aerial photographs depict the dump as being well established in 1962, suggesting the possibility of an earlier beginning. Information concerning when the landfill specifically began accepting wastes was not available to NUS/FIT from state or town records. A 24 inch thick layer of final cover material and seeding were expected to be laid down over the entire dump area after the final lift was completed [11].

Information from NUS/FIT activities and the CDM Federal site reconnaissance indicate the dump cover material is "local" soil with no indication of a liner or onsite monitoring wells. The local soil is documented to include the majority of the burning dump that was located directly northeast of the St. Johnsbury Dump [8,11].

After the landfill was closed, the land parcel leased to the Town of St. Johnsbury reverted to the State Highway Department and the construction of Interstate 91 began [11].

Table 1 presents identified structures or areas on the St. Johnsbury Dump property that are potential sources of contamination, the containment factors associated with each source, and the relative location of each source.

TABLE 1
Source Evaluation for
St. Johnsbury Dump

| Potential Source Area | Containment Factors | Spatial Location |
|-----------------------|--|--|
| Landfill | Unlined, partially covered with 2 feet of local soil | 4 acre parcel bounded by Interstate 91, High Street, Sleepers River, and U.S. Route 5 in St. Johnsbury, Vermont. |

[5,8,11]

From the early 1800s to 1967, predecessors of Colt Industries/Fairbanks Weighing Division occupied a manufacturing facility approximately 0.25 mile north of the St. Johnsbury Dump on the banks of the Sleepers River. The facility manufactured platform scales. Processes included casting, electroplating, acid etching and painting. Metals plated in the electroplating process included zinc, cadmium, copper, and lead. Prior to May 1976, all wastes generated by the Fairbanks Weighing Division of Colt Industries were transported to the St. Johnsbury Dump [11].

Table 2 summarizes the types of potentially hazardous substances that have been disposed of on the property.

TABLE 2
Hazardous Waste Quantity for
St. Johnsbury Dump

| Waste Type | Estimate Waste Quantity Generated Per Year | Years of Disposal | Estimate Total Waste Quantity Disposed |
|------------------------|--|-------------------|--|
| Paint Sludges | 12,600 kilograms (kg) | 1967 to 1975 | 113,400 kg |
| Water Soluble Coolants | 11,000 kg | 1967 to 1975 | 99,000 kg |
| Electroplating Sludges | 14,700 kg | 1975 | 14,700 kg |
| | | | Grand Total = 227,100 kg |

[11]

Prior to the closing of the St. Johnsbury Dump, VT AEC inspected the area and collected two soil samples. These samples represented material from the berm constructed along the Sleepers River and the daily cover material. It is unknown if these samples were analyzed; analytical results were not found during the file review. After the inspection, the VT AEC recommended that monitoring wells be installed for the purpose of detecting any leachate seeps adjacent to the river. The VT AEC could not verify if these were installed. Such wells were not observed during the onsite reconnaissance. Currently, the landfill property is in part owned by Mr. Richard Gorman, owner/operator of Rapid Rubbish Removal, Inc., and by the Vermont Highway Department. Mr. Gorman purchased 7.2 acres of land from Colt Industries in December 1986. Of the 7.2 acres, approximately one acre is occupied by a transfer station and two acres are occupied by the former St. Johnsbury Dump. The remaining acreage presumably lies north of the facility, adjacent to the access road for the transfer station. Mr. Gorman's property is separated from the State Highway Department property by a barbed wire fence trending parallel to the slope of the covered landfill. Information was not found identifying the exact acreage owned by the State Highway Department [11].

The CERCLA Information System (CERCLIS) discovery date for St. Johnsbury Dump was June 29, 1988 [16]. NUS/FIT completed a Preliminary Assessment of the St. Johnsbury Dump in September 1988. The Preliminary Assessment identified the groundwater pathway as the primary pathway of

concern and recommended that a SI of be performed. NUS/FIT completed an SI of the St. Johnsbury Dump, including sampling of surface soil and groundwater, in February 1990 [11].

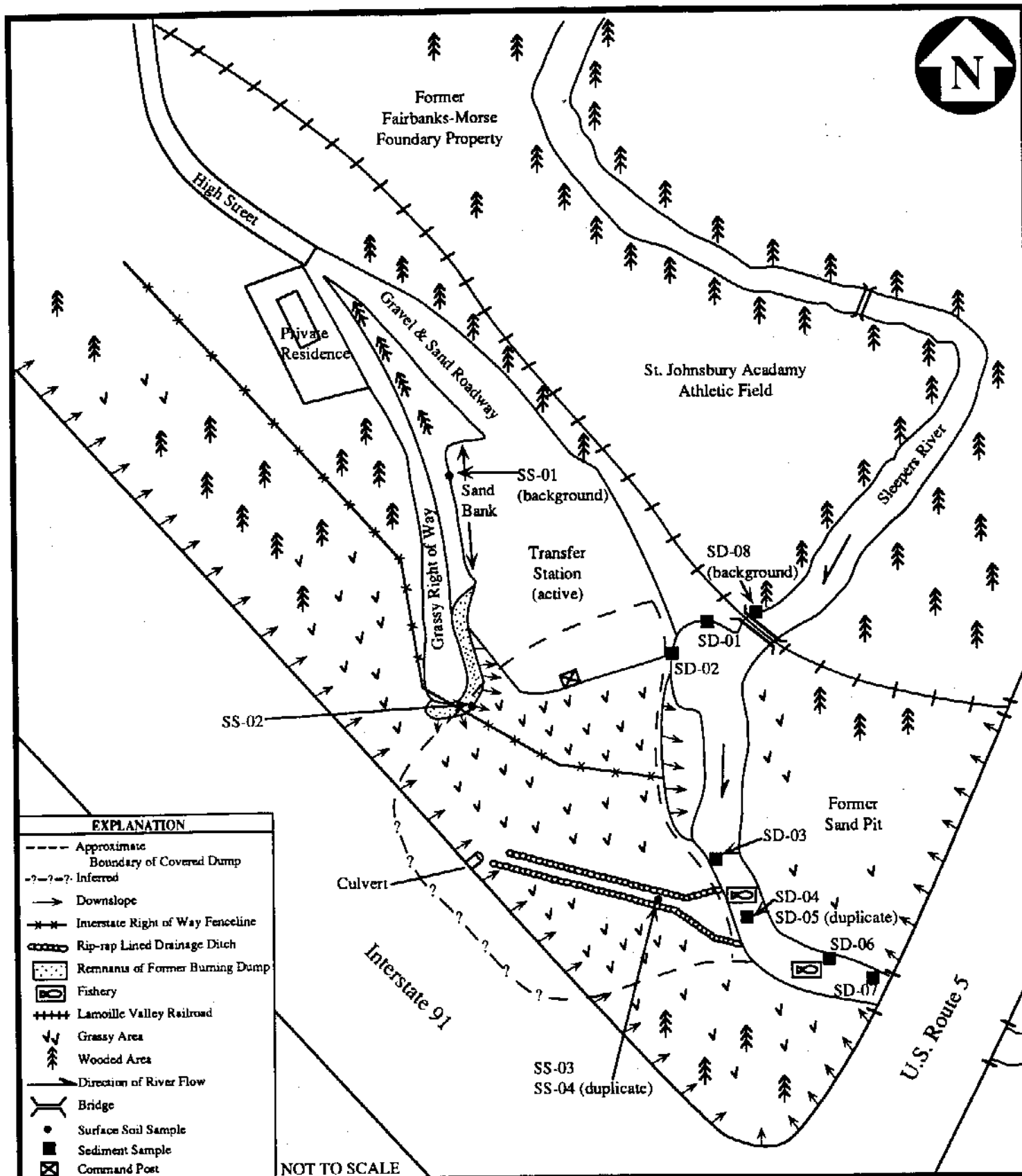
On October 12, 1994, CDM Federal conducted an onsite reconnaissance of the St. Johnsbury Dump. No wells were observed on the property during the reconnaissance. Exposed refuse was observed by CDM Federal along a rip-rap-lined surface water drainage ditch that channels stormwater from a culvert beneath Interstate 91 through the southern portion of the dump and into Sleepers River. A rust-orange, slimy algal growth was observed to encrust the gravel along the west bank of the Sleepers River, within the inferred probable point of entry (PPE) of groundwater discharging from the dump to the river. This growth was measured up to 2 inches thick on the gravel along the riverbank [5].

On December 7, 1994, CDM Federal field personnel collected four surface soil samples and eight sediment samples from the St. Johnsbury Dump and the adjacent Sleepers River. Samples were collected in accordance with the Task Work Plan, dated December 1, 1994 and approved by EPA. All samples were submitted for full Target Compound List (TCL) and Target Analyte List (TAL) through the EPA Contract Laboratory Program (CLP) Routine Analytical Services (RAS). All analytical results were reviewed according to EPA Tier II data validation protocols [12,13]. Data quality objectives established for this event were met. The Waste/Source Sampling and Surface Water Pathway sections of this report discuss the sampling event and the sampling results in more detail.

The property is not listed in the RCRA Information System [17]. The CERCLA Information System lists one site, Fairbanks Morse Foundry (VTD118078989), within 1 mile of the St. Johnsbury Dump [16].

WASTE/SOURCE SAMPLING

NUS/FIT completed a SI of the St. Johnsbury Dump in February 1990. NUS/FIT collected seven surface soil samples during the SI (see Figure 3: Site Sketch with Previous Sampling Locations). The soil samples were analyzed under EPA's CLP for volatile organic compounds (VOCS), semivolatile organic compounds (SVOCS), and inorganic elements. Polynuclear aromatic hydrocarbons (PAH), phthalates, pesticides, and inorganic elements were detected in soil samples collected from source areas onsite [11].



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Figure 3

Tables 3 and 4 summarize the samples and results collected by NUS/FIT in November 1988.

TABLE 3

**Sample Summary: St. Johnsbury Dump
Samples Collected by NUS/FIT on November 8-10, 1988**

| Sample Location No. | Traffic Report No. | Date Time | Remarks | Sample Source |
|---------------------|--------------------|------------------|--------------------|---|
| MATRIX: Soil | | | | |
| SS-01 | AM911 MAK780 | 11/9/88 0956 | Grab | Shallow sample from northern base of landfill toe along bank of eastern perimeter |
| SS-02 | AM912 MAK781 | 11/9/88 1019 | Grab | Shallow sample from base of landfill toe beneath exposed pipe south of SS-01 |
| SS-03 | AM913 MAK782 | 11/9/88 1040 | Grab | Shallow sample from gullied area above slope toe west of SS-02 |
| SS-04 | AM914 MAK783 | 11/9/88 1100 | Grab | Shallow sample from gullied area (near exposed drum) above slope toe north of SS-03 |
| SS-05 | AM915 MAK784 | 11/9/88 1115 | Grab | Shallow sample from area of stained soil on crest of landfill slope, north of SS-04 |
| SS-05D | AM916 MAK785 | 11/9/88 1120 | Duplicate of SS-05 | Same as SS-05 |
| SS-06 | AM917 MAK786 | 11/9/88 1135 | Grab | Shallow sample from northeast corner of the dump by the top of the slope toe |
| SS-07 | AM918 MAK787 | 11/10/88 1725 | Grab | Offsite, in wooded area northwest of SS-06; background. |
| SS-08 | AM919 | 11/8/88 1600 | Trip Blank | Baked potting soil |

[11]

Table 4 presents a summary of compounds and analytes detected in the analyses of source samples collected by NUS/FIT. For each sampling location, a compound or analyte is listed if it was detected at least three times greater than the reference sample concentration. The background sample (SS-07) concentrations are established as the reference concentrations. Compounds or analytes that occur at a concentration at least three times greater than the reference concentration are designated by their approximate relative value above the reference concentration. If the analyte or compound is not detected in the reference sample, the reference sample quantitation limit (SQL) (for organic analyses) or sample detection limit (SDL) (for inorganic analyses) is used as a reference value. Accordingly, compounds or analytes are listed by their approximate concentration above the SQL or SDL only if they occur at a value equal to or greater than the reference sample's SQL or SDL.

TABLE 4

Summary of Analytical Results
Source Sample Analysis for St. Johnsbury Dump
Samples Collected by NUS/FIT
on November 8-10, 1988

| Sample Location No. | Compound/Element | Concentration | Reference Concentration | Comment |
|---------------------|------------------------|----------------|-------------------------|------------|
| SS-01 | Benzo(a)anthracene | 430 ppb | 420 U ppb | 1.0 x SQL |
| | Barium | 628 mg/kg | 86 mg/kg | 7.30 x REF |
| | Copper | 503 J mg/kg | 21.3 mg/kg | 23.6 x REF |
| | Iron | 64,100 J mg/kg | 17,100 mg/kg | 3.75 x REF |
| | Lead | 1,580 J mg/kg | 70.4 mg/kg | 22.4 x REF |
| | Manganese | 1,740 mg/kg | 505 mg/kg | 3.45 x REF |
| | Silver | 85.0 mg/kg | 25.7 mg/kg | 3.31 x REF |
| | Zinc | 2,410 J mg/kg | 76.9 mg/kg | 31.3 x REF |
| SS-02 | Barium | 1350 mg/kg | 86 mg/kg | 16 x REF |
| | Cadmium | 16.9 J mg/kg | 4.7 J mg/kg | 3.6 x REF |
| | Iron | 91,500 mg/kg | 17,000 mg/kg | 5.35 x REF |
| SS-03 | Copper | 74.9 mg/kg | 21.3 mg/kg | 3.52 x REF |
| SS-04 | Phenanthrene | 1,300 ppb | 80 J ppb | 16 x REF |
| | Fluoranthene | 2,300 ppb | 200 J ppb | 11 x REF |
| | Pyrene | 2,300 ppb | 200 J ppb | 11 x REF |
| | Benzo(a)anthracene | 1,400 ppb | 150 J ppb | 9.3 x REF |
| | Benzo(b)fluoranthene | 1,200 ppb | 440 U ppb | 2.7 x SQL |
| | Benzo(k)fluoranthene | 920 ppb | 440 U ppb | 2.1 x SQL |
| | Benzo(a)pyrene | 1,300 ppb | 440 U ppb | 3.0 x SQL |
| | Indeno(1,2,3-cd)pyrene | 1,100 ppb | 440 U ppb | 2.5 x SQL |
| | Benzo(g,h,i)perylene | 1,000 ppb | 440 U ppb | 2.3 x SQL |
| | Endosulfan sulfate | 87 ppb | 40 U ppb | 2.2 x SQL |
| | Copper | 392 J mg/kg | 21.3 mg/kg | 18.4 x REF |
| | Iron | 53,100 J mg/kg | 17,100 mg/kg | 3.11 x REF |
| | Zinc | 601 J mg/kg | 76.9 J mg/kg | 7.82 x REF |
| SS-05 | Mercury | 5.1 J mg/kg | 1.0 J mg/kg | 5.1 x REF |

REF = Reference Concentration

SQL = Sample Quantitation limit

U = Indicates the sample was analyzed but not detected and reports the detection value

ppb = Parts per billion = $\mu\text{g/kg}$ (micrograms per kilogram)

mg/kg = Milligrams per kilogram = ppm (parts per million)

[11]

In December 1994, CDM Federal collected four surface soil samples from the St. Johnsbury Dump. The samples were analyzed under EPA's CLP program for the full TCL and TAL via RAS. The sampling included three grab surface soil samples from potential source areas and one grab background sample at the St. Johnsbury Dump. All samples from potential source areas were collected from 2 to 6 inches below ground surface (bgs). The background sample was collected from an exposed sand bank northwest of the onsite transfer station. This background location was selected because the soil at this location was most similar to that of the other samples [5]. Figure 4 illustrates the approximate locations of the samples. Analytical results were rejected for several analytes in SS-02 during the data validation process because of poor reproductivity between analytical column quantitated results [12]. Table 5 and Table 6 summarize the samples and results of CDM Federal's source sampling event.

TABLE 5

**Soil Sample Summary: St. Johnsbury Dump
Samples Collected by CDM Federal on December 7, 1994**

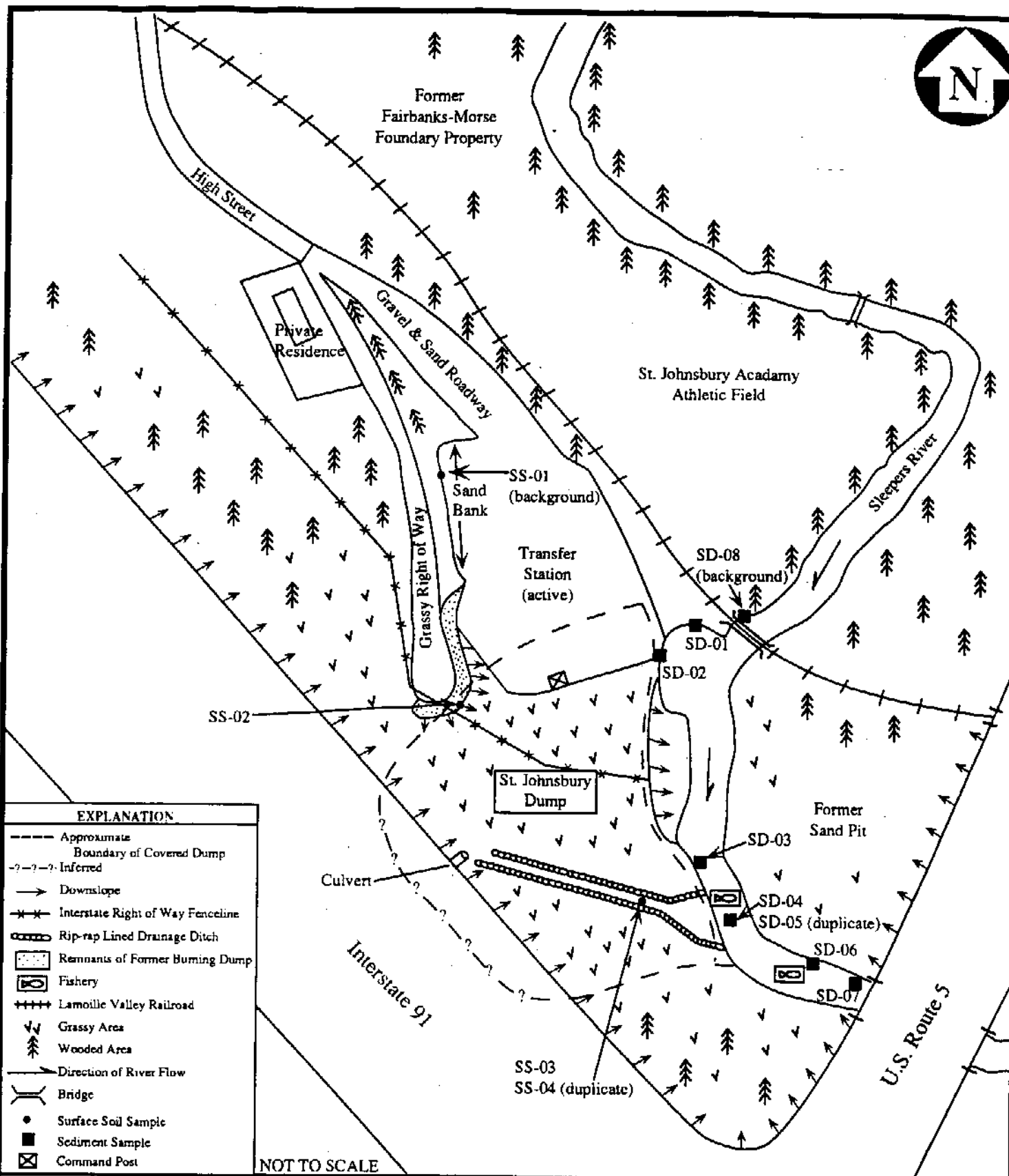
| Sample Location No. | Traffic Report No. | Time | Remarks | Sample Source |
|---------------------|-------------------------|------|---------|--|
| SS-01 | AHZ75 (O) MAFX75 (I) | 1230 | Grab | Sandbank area; background |
| SS-02 | AHZ76 (O) MAFX76 (I) | 1300 | Grab | Remains of the former burning dump |
| SS-03 | AHZ77 (O) MAFX77 (I) | 1430 | Grab | Rip-rap-lined drainage ditch directly upgradient from the heavily bouldered area, approximately 1/3 down the steepest portion of the landfill/dump slope |
| SS-04 | AHZ78 (O) MAFX78 (I) | 1430 | Grab | Duplicate of SS-03 for QC |

O = RAS organic sample analysis

I = RAS inorganic sample analysis

[5]

For each sampling location, a compound or analyte is listed on Table 6 if it was detected at least three times greater than the reference sample concentration. The background sample (SS-01) concentrations are established as the reference concentrations. Compounds or analytes that occur at a concentration at least three times greater than the reference concentration are designated by their approximate relative value above the reference concentration. If the analyte or compound is not detected in the reference sample, the reference SQL (for organic analyses) or SDL (for inorganic analyses) is used as a reference value. Accordingly, compounds or analytes are listed by their approximate concentration above the SQL or SDL only if they occur at a value equal to or greater than the reference sample's SQL or SDL.



SITE SKETCH WITH SIP SAMPLING LOCATIONS
ST. JOHNSBURY DUMP
ST. JOHNSBURY, VERMONT

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Figure 4

TABLE 6

**Summary of Analytical Results
Surface Soil Sample Analysis for
St. Johnsbury Dump
Samples Collected by CDM Federal on December 7, 1994**

| Sample Location No. | Compound/Element | Concentration | Reference Concentration | Comments |
|---------------------|------------------|------------------------|-------------------------|------------|
| SS-02 | Aroclor-1254 | 430 J $\mu\text{g/kg}$ | 41 U $\mu\text{g/kg}$ | 10 x SQL |
| | Endrin | 10 J $\mu\text{g/kg}$ | 4.1 U $\mu\text{g/kg}$ | 2.4 x SQL |
| | Antimony | 3.9 J mg/kg | 2.9 UJ mg/kg | 1.3 x SDL |
| | Arsenic | 5.4 mg/kg | 1.3 J mg/kg | 4.2 x REF |
| | Barium | 124 mg/kg | 31.1 mg/kg | 3.99 x REF |
| | Cadmium | 3.5 J mg/kg | 0.9 J mg/kg | 3.6 x REF |
| | Calcium | 12,100 mg/kg | 2,520 mg/kg | 4.80 x REF |
| | Copper | 542 mg/kg | 16.9 mg/kg | 32.1 x REF |
| | Lead | 255 mg/kg | 7.7 mg/kg | 33 x REF |
| | Zinc | 260 mg/kg | 36.0 mg/kg | 7.22 x REF |
| SS-03 | Arsenic | 4.2 mg/kg | 1.3 J mg/kg | 3.2 x REF |
| | Calcium | 35,000 mg/kg | 2,520 mg/kg | 13.9 x REF |
| SS-04 | Calcium | 26,300 mg/kg | 2,520 mg/kg | 10.4 x REF |

J = Quantitation is estimated due to limitations identified during quality central review.

$\mu\text{g/kg}$ = Micrograms per kilogram = ppb (parts per billion)

mg/kg = Milligrams per kilogram = ppm (parts per million)

REF = Reference Concentration

SDL = Sample detection limit

SQL = Sample quantitation limit

U = Not detected

UJ = The compound was not detected. The compound quantitation limit is an estimated value.

note: The precision of entries in the comments column are governed by the rules of significant digits.
[12,13]

The complete analytical results of CDM Federal source sampling activities, including quantitation and detection limits, are presented in Attachments A and B. Sample results

in the analytical tables are considered approximate because of limitations identified during the CLP data validation. In addition, organic sample results reported at concentrations below quantitation limits, and confirmed by mass spectrometry, are also qualified by a "J" and are considered approximate.

CDM Federal's analytical results indicate the presence of contaminants in surface soils at the St. Johnsbury Dump including PAHs, polychlorinated biphenyls (PCBs), and inorganics. Analytical results were rejected for several pesticides in SS-02 during the data validation process because of poor reproductivity between analytical column quantitated results [11,12,13].

Background information indicates that the Fairbanks-Morse Foundry produced weighing scales and used the St. Johnsbury dump as a disposal area for paint-sludges, water soluble coolants, and electroplating sludges [11]. Arsenic and antimony are used as trace elements in alloys to impart strength and color. Barium and calcium are alkaline earth metals which are used in metallurgy as deoxidizers of copper and steel and to harden lead for bearings. Lead has been used as a pigment for paint, and a metal for bearings and alloys. Zinc is used in metallurgy to inhibit corrosion and to improve castings. The presence of these metals in the dump may be attributable to the foundry waste disposed by the Fairbanks-Morse Foundry into the St. Johnsbury dump. Endrin is an insecticide which is no longer used in the United States. Attribution of this insecticide is unknown. Aroclor-1254 is a polychlorinated biphenyl (PCB) containing approximately 54% chlorine. PCB's have been used as hydraulic fluids, wax extenders, lubricants, cutting oils, and in heat transfer systems [23].

Once operation of the dump was assumed by the town, household refuse was burned [11]. PAHs are possible or probable human carcinogens which are products of incomplete combustion [10]. Cover and berm materials for expanded portions of the dump are documented to have come from the burning dump area and are likely to be the source of the PAHs detected in soil samples [5,8,11].

GROUNDWATER PATHWAY

The bedrock underlying the property is composed of two formations: the Waits River Formation and the Gile Mountain Formation. The Waits River Formation is a rock unit composed of calcareous granulites, schists, and calc-silicates interbedded with quartz mica schist and micaceous quartzite. The Gile Mountain Formation is composed of light and dark grey schists with a greater proportion of quartz [11]. Bedrock is exposed along the western bank of the Sleepers River [5].

Surficial soils in the St. Johnsbury region are glaciolacustrine and glaciofluvial in origin. Soils in the immediate area of the St. Johnsbury Dump are alluvial. To the north and south, silty clays are prevalent. To the northeast and east are lake sands and a north-south trending esker. To the west, kame terraces are present [11].

clays are prevalent. To the northeast and east are lake sands and a north-south trending esker. To the west, kame terraces are present [11].

The direction of groundwater flow in the overburden in the vicinity of the St. Johnsbury Dump is inferred to mimic area topography. Groundwater studies conducted at the former Fairbanks Morse Foundry (approximately 0.25 mile north of the dump) indicate that groundwater flow is either parallel to the Sleepers River or towards it in an easterly direction. Depth to groundwater is approximately 6 feet below the ground surface at the dump [11]. The state of Vermont has not established a monitoring well network to monitor groundwater quality [19].

The only municipal groundwater source identified within 4 miles of the property is the back-up well for the town of St. Johnsbury. There is a wellhead protection area for this well [20]. This well, located approximately 1.3 mile north, is maintained as a backup source to Stiles Pond. The backup well has a potential pumping rate of 1.5 million gallons per day [7]. In an emergency, the backup well could potentially serve the whole St. Johnsbury municipal water system (3,000 connections/8,160 people) [7,11]. Stiles Pond is the primary municipal water supply for St. Johnsbury and is located 4 miles east of the dump at a higher elevation in Waterford, Vermont [11]. Table 7 presents the public groundwater supply sources within 4 miles of the St. Johnsbury Dump.

TABLE 7
Public Groundwater Supply Sources Within 4 Miles of
St. Johnsbury Dump

| Distance/ Direction from Property | Source Name | Location of Source (Town) | Estimated Population Served | Source Type |
|---|---------------------------------|---------------------------------|--------------------------------|----------------|
| 1.3 miles/North | St. Johnsbury Emergency Well | St. Johnsbury | 8,160 | Overburden |

[7,11]

Based on U.S. Census Bureau data, it is estimated that 363 private water supply wells are located within 4 miles of the St. Johnsbury Dump, serving an estimated 986 people [6]. The nearest private well is within 0.25 mile, however, the exact location is unknown [6]. Table 8 lists the estimated drinking water populations served by groundwater sources within 4 miles of the St. Johnsbury Dump.

TABLE 8**Estimated Drinking Water Populations Served by Groundwater Sources
Within 4 Miles of St. Johnsbury Dump**

| Radial Distance from St. Johnsbury Dump (miles) | Estimated Population Served by Private Wells | Estimated Population Served by Public Wells | Total Estimated Population Served by Groundwater Sources within the Ring |
|---|--|---|---|
| 0.00 - 0.25 | 3 | 0 | 3 |
| > 0.25 - 0.50 | 8 | 0 | 8 |
| > 0.50 - 1.00 | 44 | 0 | 44 |
| > 1.00 - 2.00 | 182 | 8,160 | 8,342 |
| > 2.00 - 3.00 | 311 | 0 | 311 |
| > 3.00 - 4.00 | 438 | 0 | 438 |
| TOTAL | 986 | 8,160 | 9,146 |

[1,6,7,11]

On November 9 and 10, 1988, NUS/FIT collected groundwater samples along the eastern boundary of the dump, adjacent to the Sleepers River. NUS/FIT used a well point sampler and peristaltic pump to collect groundwater from a depth of approximately 6 feet below the ground surface [11]. CDM Federal did not conduct any groundwater sampling during this SIP. A summary of the groundwater samples collected by NUS/FIT is presented in Table 9.

TABLE 9**Groundwater Sample Summary: St. Johnsbury Dump
Samples Collected by NUS/FIT, November 8-10, 1988**

| Sample Location No. | Traffic Report No. | Remarks | Sample Source |
|---------------------|--------------------|--------------------|---|
| GW-01 | AM920, MAK788 | Grab, Background | At toe of dump on eastern boundary, adjacent to river |
| GW-03 | AM921, MAK789 | Grab | At toe of dump on eastern boundary, adjacent to river, north of GW-01 |
| GW-03R | AM922, MAK790 | Replicate of GW-03 | Same as GW-03 |
| GW-07 | AM923, MAK791 | Equipment Blank | Deionized water |

[11]

Table 10 presents a summary of compounds and analytes detected in the analyses of groundwater samples collected by NUS/FIT. For each sampling location, a compound or analyte is listed if it was detected at least three times greater than the reference sample concentration. The background sample (GW-01) concentrations are established as the reference concentrations. Compounds or analytes that occur at a concentration at least three times greater than the reference concentration are designated by their approximate relative value above the reference concentration. If the analyte or compound is not detected in the reference sample, the reference sample quantitation limit (SQL) (for organic analyses) or sample detection limit (SDL) (for inorganic analyses) is used as a reference value. Accordingly, compounds or analytes are listed by their approximate concentration above the SQL or SDL only if they occur at a value equal to or greater than the reference sample's SQL or SDL.

TABLE 10

**Summary of Analytical Results
Groundwater Samples for St. Johnsbury Dump
Samples Collected by NUS/FIT, November 9-10, 1988**

| Sample Location | Compound/Element | Sample Concentration ($\mu\text{g/l}$) | Reference Concentration ($\mu\text{g/l}$) | Comments |
|-----------------|------------------|--|---|------------|
| GW-03 | Manganese | 9,400 | 2,150 | 4.37 x REF |
| | Silver | 449 | 104 | 4.32 x REF |
| GW-03R | Manganese | 9,340 | 2,150 | 4.34 x REF |
| | Silver | 448 | 104 | 4.31 x REF |

GW-03R is a replicate of GW-03.

$\mu\text{g/l}$ = micrograms per liter

REF = Reference Concentration

[11]

Reportedly, property conditions and inclement weather prevented NUS/FIT from collecting an ideal reference groundwater sample [11]. For comparison purposes, GW-1 is used as a reference sample. However, the location of GW-1 is still within the potential influence of the St. Johnsbury Dump. Concentrations of benzene (5 ppb) and cadmium (68.5 ppb) detected in sample GW-1 by NUS/FIT exceeded the EPA established maximum contaminant level (MCLs) [11]. Both NUS/FIT and CDM Federal detected elevated levels of cadmium in the source soil samples collected in November 1988 and December 1994 [11,12,13].

Background information indicates that the Fairbanks-Morse Foundry used the St. Johnsbury Dump as a disposal area for electroplating sludges, paint sludges, and water soluble coolants. Silver is one of the raw products used in coating, chromating, phosphating, metal coloring, and immersion plating while manganese is one of constituents of coating sludges [4]. Cadmium is a major component in electroplating and engraving [23].

SURFACE WATER PATHWAY

The probable point of entry (PPE) of surface water migrating from the property via overland flow, or groundwater to surface water discharge, to the Sleepers River is along the river frontage adjacent to the eastern boundary of the St. Johnsbury Dump. The Sleepers River flows southeast for approximately 0.5 mile where it empties into the Passumpsic River. The Passumpsic River flows south for approximately 8 miles before emptying into the Connecticut River, which flows south for 6.5 miles where it reaches the 15-mile downstream pathway (DSP)

at McIndoe Falls in Barnet, Vermont [11]. Table 11 lists water bodies that lie within the 15-mile DSP from St. Johnsbury Dump.

TABLE 11
Water Bodies Within the Surface Water Segment of
St. Johnsbury Dump

| Surface Water Body | Descriptor ^a | Length of Reach | Flow Characteristics (Cubic feet per second) | Length of Wetlands |
|--------------------|--------------------------|-----------------|--|--------------------|
| Sleepers River | Small to moderate stream | 2,500 feet | 66.5 | None |
| Passumpsic River | Moderate to large stream | 8 miles | 747 | less than 1 mile |
| Connecticut River | Large stream to river | 6.5 miles | 4,730 | None |

^a Minimal stream. Small to moderate stream. Moderate to large stream. Large stream to river. Very large river. Coastal tidal waters. Shallow ocean zone or Great Lake. Deep ocean zone or Great Lake. Three-mile mixing zone in quiet flowing river.

[11,18]

No municipal drinking water intakes are along the Sleepers, Passumpsic, or Connecticut Rivers within the 15-mile DSP [1,2,3,11]. All waters along the 15-mile DSP are Class B, suitable for recreation and a drinking water source [11,22]. The Sleepers River has been designated as a potential drinking water source by the VT ANR/DEC Water Quality Division, but is not currently in use [11]. The total frontage of wetlands within the 15-mile DSP is of less than 1 mile and occur along the Passumpsic River approximately 1.5 miles downstream from the dump [15]. There are no known endangered or threatened species within the 15-mile DSP [11].

Recreational activities for the Sleepers, Passumpsic, and Connecticut Rivers include boating, swimming, and recreational sport fishing. However, boating and swimming are limited in the Sleepers River due to low water levels during the summer months. Both the Sleepers and Passumpsic Rivers are cold water streams. Primary fish habitats found along the downstream pathway of the Sleepers River are for rainbow trout and brown trout. Fish habitats within these portions of the Sleepers River reportedly have been "negatively affected" by the construction of Interstate 91 and by industrial processes associated with the former Fairbanks Morse Foundry [11]. Fishing is known to occur in the pools of the Sleepers River between Interstate 91 and Route 5 [9]. Primary fish habitats found in the lower Passumpsic River include brown trout and the minnow family Cyprinidae. Fish habitats found within the DSP of the Connecticut River include brook, brown, and rainbow trout; large- and smallmouth bass; pike; pickerel; walleye; and bullhead [22].

CDM Federal collected eight sediment samples from the banks of the Sleepers River to determine if contaminants have migrated from the St. Johnsbury Dump to the river (see Figure 4). The sediment samples were collected from the Sleepers River along the southeastern boundary of the St. Johnsbury Dump. Samples were analyzed for full TAL/TCL contaminants via EPA's CLP. One sample, SD-08, was collected as a background sample to characterize sediment upstream of the dump. Sediment at SD-08 consisted of very fine grey sand. Sediment at locations SD-01, SD-02, and SD-03 consisted of fine grey sand. Sediment at SD-04/05 consisted of fine sand and gravel. Sediment at SD-06 consisted of fine to medium, grey sand. Sediment at SD-07 consisted of fine to medium, grey sand. A rust-orange, slimy algal growth observed to encrust the gravel in the area of SD-04/05 during the October 1994 site reconnaissance was not observed during the December 1994 sampling event. The Sleepers River was flowing at a significantly higher rate during the sampling event than during the site reconnaissance. Ripple marks were observed by CDM Federal in the sediments at SD-06 and SD-07 [5].

A summary of the sediment samples collected by CDM Federal is presented in Table 12.

TABLE 12

**Sediment Sample Summary: St. Johnsbury Dump
Samples Collected by CDM Federal, December 7, 1994**

| Sample Location No. | Traffic Report No. | Time | Remarks | Sample Source |
|---------------------|-------------------------|------|---------|---|
| SD-01 | AHZ79 (O) MAFX79 (I) | 1510 | Grab | Sleepers River approximately 50 feet downstream of the railroad trestle |
| SD-02 | AHZ80 (O) MAFX80 (I) | 1500 | Grab | Sleepers River approximately 150 feet downstream of the railroad trestle |
| SD-03 | AHZ81 (O) MAFX81 (I) | 1345 | Grab | Sleepers River approximately 75 feet upstream of SD-04/05 |
| SD-04 | AHZ82 (O) MAFX82 (I) | 1320 | Grab | Sleepers River within the suspected groundwater to surface water discharge area |
| SD-05 | AHZ83 (O) MAFX83 (I) | 1320 | Grab | Same as SD-04; Replicate for QC |
| SD-06 | AHZ84 (O) MAFX84 (I) | 1245 | Grab | Sleepers River approximately 75 feet upstream of SD-07; fishery |
| SD-07 | AHZ85 (O) MAFX85 (I) | 1220 | Grab | Sleepers River approximately 10 feet upstream of the easternmost abutment for the Route 5 overpass; fishery |
| SD-08 | AHZ86 (O) MAFX86 (I) | 1545 | Grab | Sleepers River approximately 45 feet upstream of railroad trestle; background sample |

O = RAS Organic Sample Analysis

I = RAS Inorganic Sample Analysis

[5]

Table 13 presents summaries of compounds and analytes detected in the analyses of sediment samples collected by CDM Federal. For each sampling location, a compound or analyte is listed if it was detected at least three times greater than the reference sample concentration. The background sample (SD-08) concentrations are established as the reference concentrations. Compounds or analytes that occur at a concentration at least three times greater than the reference concentration are designated by their approximate relative value above the reference concentration. If the analyte or compound is not detected in the reference sample, the reference SQL (for organic analyses) or SDL (for inorganic analyses) is used as a reference value. Accordingly, compounds or analytes are listed by their approximate concentration above the SQL or SDL only if they occur at a value equal to or greater than the reference sample's SQL or SDL.

TABLE 13

**Summary of Analytical Results
Sediment Sample Analysis for St. Johnsbury Dump
Samples Collected by CDM Federal, December 7, 1994**

| Sample Location No. | Compound/Element | Concentration | Reference Concentration (Sample SD-08) | Comment |
|---------------------|------------------|----------------|--|------------|
| SD-01 | Lead | 173 J mg/kg | 11.6 J mg/kg | 14.9 x REF |
| SD-04 | Calcium | 78,500 J mg/kg | 9430 J mg/kg | 8.32 x REF |
| | Aroclor-1254 | 67 J µg/kg | 46 U µg/kg | 1.5 x SQL |

J = Estimated Value
 µg/kg = Micrograms per kilogram
 mg/kg = Milligrams per kilogram
 REF = Reference concentration
 SQL = Sample quantitation limit
 U = Undetected, SQL is listed.

[12,13]

The complete analytical results of the sediment sampling activities, including quantitation and detection limits, are presented in Attachments A and B. Sample results qualified with a "J" on the analytical tables are considered approximate because of limitations identified during the CLP data validation. In addition, organic sample results reported at concentrations below quantitation limits, and confirmed by mass spectrometry, are also qualified by a "J" and are considered approximate.

Analytical results were rejected for the pesticide gamma-chlordane in SD-04 during the data

validation process because of poor reproductivity between analytical column quantitated results [10]. All contaminants listed in Table 13 were also detected in the source samples collected by CDM Federal. The contaminants listed in Table 13 are associated with either electroplating or paint processes and their presence in samples collected from the Sleepers River are likely due to migration of contamination from the St. Johnsbury Dump to the river [4,14].

SOIL EXPOSURE PATHWAY

Surface soils in the St. Johnsbury region are generally glaciolacustrine, glaciofluvial and post glaciofluvial. Soils in the immediate area of the St. Johnsbury Dump are alluvial [11]. Soil sampling was conducted by NUS/FIT in November 1988 and CDM Federal in December 1994. Soil sampling results indicated elevated levels of PAHs, phthalates, PCBs, and inorganic elements. The Waste/Source Sampling section of this document details the sampling and results. Figures 3 and 4 illustrate the approximate sample locations for each event. Attachments A and B to this document contain the organic and inorganic results from the December 1994 CDM Federal sampling event.

Rapid Rubbish Removal, Inc., currently operates a transfer station on a portion of the St. Johnsbury Dump [5,11]. During posted operating hours, there are one to three workers at the transfer station. Residents of St. Johnsbury deposit rubbish and recyclables during operating hours [5].

The nearest residence is approximately 700 feet north of the dump [5,11]. An estimated 2,548 people live within a mile radius of the dump [6]. There are no documented terrestrial sensitive environments on the St. Johnsbury Dump property [11]. There are no day care/schools within 200 feet of areas of observed contamination [5,11].

Vehicular access is limited by an entrance gate to the transfer station at the southern end of High Street. Pedestrian access to the St. Johnsbury Dump is unrestricted [5,11].

AIR PATHWAY

The nearest resident to the St. Johnsbury Dump is approximately 700 feet north of the property [5,11]. An estimated 2,548 people live within 1 mile of the property and approximately 6,992 live within 4 miles of the property [6]. Table 14 summarizes the residential population within a 4 mile radius of the St. Johnsbury Dump.

TABLE 14**Estimated Population Within 4 Miles of
St. Johnsbury Dump**

| Radial Distance From St. Johnsbury Dump (miles) | Estimated Population |
|--|----------------------|
| 0.00 - 0.25 | 192 |
| > 0.25 - 0.50 | 623 |
| > 0.50 - 1.00 | 1,733 |
| > 1.00 - 2.00 | 1,656 |
| > 2.00 - 3.00 | 1,530 |
| > 3.00 - 4.00 | 1,258 |
| TOTAL | 6,992 |

[6]

One state designated threatened species habitat (ram's head lady's slipper), one endangered species habitat (sheathed sedge), and one state designated natural area (Northern white cedar swamp) are located within the 4-mile radius of the property [11].

During CDM Federal's reconnaissance and sampling event, total VOC concentrations were monitored with a MiniRAE photoionization detector (PID). No concentrations above background were detected. During both events, the PID recorded 0.0 ppm as a background reading [5]. Background research did not reveal any additional air sampling events.

SUMMARY

The St. Johnsbury Dump is located on approximately 4 acres of land south of High Street in St. Johnsbury, Caledonia County, Vermont. An estimated 6,992 people live within 4 miles of the St. Johnsbury Dump. An estimated 2,548 people live within a mile radius of the dump.

The dump accepted paint sludges, water soluble coolants, and electroplating sludge from a local industrial manufacturer, and household refuse from local residents from prior to 1943 to 1975. The dump is assumed to be unlined, "based on age and statewide general practice." No known monitoring wells are on the property. Upon closure in 1975, the dump was covered with approximately 2 feet of soil and seeded.

During the onsite reconnaissance of the St. Johnsbury Dump, CDM Federal Programs Corporation (CDM Federal) observed exposed refuse along the rip-rap-lined surface water drainage ditch that channels stormwater from Interstate 91 through the southern portion of the dump and in the Sleepers River. The deeper pools of the Sleepers River, just north of the U.S. Route 5 overpass, are local fisheries. The 15-mile downstream pathway includes the Sleepers, Passumpsic, and Connecticut rivers. Wetlands are located along the Passumpsic portion of the downstream pathway. There are no documented drinking water intakes along the 15-mile downstream pathway.

Currently, a portion of the St. Johnsbury Dump is occupied by the Rapid Rubbish Removal, Inc., transfer station. One to three workers at the transfer station accept refuse and recyclables from the residents of St. Johnsbury. Vehicular traffic is restricted by a locked gate when the transfer station is closed. There are no physical restrictions to pedestrian traffic. There are no day care/schools within 200 feet of areas of observed contamination.

NUS Corporation/Field Investigation Team (NUS/FIT) and CDM Federal conducted SI and SIP sampling events in November 1988 and December 1994, respectively. The NUS/FIT sampling event revealed elevated concentrations of polynuclear aromatic hydrocarbons (PAHs), phthalates, and inorganic elements in both the soil and groundwater. The CDM Federal sampling event revealed elevated concentrations of polychlorinated biphenols (PCBs), semivolatile organic compounds (SVOCs) and inorganic elements in onsite surface soil and in the sediment from the adjacent Sleepers River. The data from both field events reveal contaminants associated with electroplating and painting process wastes known to be disposed of in the dump.

The nearest private well is within 0.25 mile from the St. Johnsbury Dump. The nearest public well is the back-up well for the town of St. Johnsbury. This well is approximately 1.3 mile north and has a potential pumping rate of 1.5 million gallons per day. This back-up well could potentially serve the whole St. Johnsbury municipal water system with an estimated 8,160 people. There is a wellhead protection area for this well. Stiles pond is the primary municipal water supply for St. Johnsbury and is located 4 miles east of the St. Johnsbury Dump. An

estimated 9,146 people are served by groundwater sources with 4 miles of the St. Johnsbury Dump. The nearest residence is approximately 700 feet north of the dump.

There are no documented terrestrial sensitive environments on the St. Johnsbury Dump property. One state designated threatened species habitat (ram's head lady's slipper), one endangered species habitat (sheathed sedge), and one state designated natural area (Northern white cedar swamp) are located within 4 miles of the St. Johnsbury Dump.

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ATTACHMENT A

St. Johnsbury Dump

**Organic Analytical Results and Sample Quantitation Limits
CDM Federal Programs Corporation**

December 7, 1994

| EPA SAMPLE NUMBER: | AH275 | AH276 | AH277 | AH278 | AH279 | AH280 |
|----------------------------|----------------|----------------|----------------|----------------|----------------|----------------|
| SAMPLE LOCATION: | SS-01 | SS-02 | SS-03 | SS-04 | SD-01 | SD-02 |
| LABORATORY SAMPLE NUMBER: | 956601 | 956604 | 956605 | 956606 | 956607 | 956608 |
| SAMPLE TYPE: | Routine Sample | Routine Sample | Routine Sample | Routine Sample | Routine Sample | Routine Sample |
| MATRIX/ANALYSIS: | SOIL/LOW | SOIL/LOW | SOIL/LOW | SOIL/LOW | SOIL/LOW | SOIL/LOW |
| DILUTION FACTOR: | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 |
| DATE SAMPLED: | 12/08/94 | 12/08/94 | 12/08/94 | 12/08/94 | 12/08/94 | 12/08/94 |
| DATE ANALYZED: | 12/11/94 | 12/11/94 | 12/11/94 | 12/11/94 | 12/11/94 | 12/11/94 |
| PERCENT SOLID: | 81 | 86 | 72 | 73 | 75 | 78 |
| VOA | | | | | | |
| Chloromethane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Bromomethane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Vinyl Chloride | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Chloroethane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Methylene Chloride | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Acetone | 12 U | 12 U | 71 UJ | 54 UJ | 13 U | 13 U |
| Carbon Disulfide | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| 1,1-Dichloroethene | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| 1,1-Dichloroethane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| 1,2-Dichloroethene (total) | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Chloroform | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| 1,2-Dichloroethane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| 2-Butanone | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| 1,1,1-Trichloroethane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Carbon Tetrachloride | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Bromodichloromethane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| 1,2-Dichloropropane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| cis-1,3-Dichloropropene | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Trichloroethene | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Dibromochloromethane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| 1,1,2-Trichloroethane | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Benzene | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| trans-1,3-Dichloropropene | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| Bromoform | 12 U | 12 U | 14 U | 14 U | 13 U | 13 U |
| 4-Methyl-2-Pentanone | 12 U | 12 UJ | 14 U | 14 U | 13 U | 13 U |
| 2-Hexanone | 12 U | 12 UJ | 14 U | 14 U | 13 U | 13 U |
| Tetrachloroethene | 12 U | 12 UJ | 14 U | 14 U | 13 U | 13 U |
| 1,1,2,2-Tetrachloroethane | 12 U | 12 UJ | 14 U | 14 U | 13 U | 13 U |
| Toluene | 12 U | 12 UJ | 14 U | 14 U | 13 U | 13 U |
| Chlorobenzene | 12 U | 12 UJ | 14 U | 14 U | 13 U | 13 U |
| Ethylbenzene | 12 U | 12 UJ | 14 U | 14 U | 13 U | 13 U |
| Styrene | 12 U | 12 UJ | 14 U | 14 U | 13 U | 13 U |
| Xylene (total) | 12 U | 12 UJ | 14 U | 14 U | 13 U | 13 U |

FILENAME: AHZ73.SDG DATE: 01/17/95 TIME: 15:29 CADRE 1.92

Water units are reported in ug/L.
Soil units are reported in ug/Kg.

CASE NO: 23023
SDG NO: AHZ73

SITE: ST. JOHNSBURY DUMP ST. JOHNSBURY, VT
LABORATORY: AMER ANALYTICAL TECH SERV

| EPA SAMPLE NUMBER: | AH281 | AH282 | AH283 | AH284 | AH285 | AH286 |
|----------------------------|----------------|----------------|----------------|----------------|----------------|----------------|
| SAMPLE LOCATION: | SD-03 | SD-04 | SD-05 | SD-06 | SD-07 | SD-08 |
| LABORATORY SAMPLE NUMBER: | 956609 | 956610 | 956611 | 956612 | 956613 | 956614 |
| SAMPLE TYPE: | Routine Sample | Routine Sample | Routine Sample | Routine Sample | Routine Sample | Routine Sample |
| MATRIX/ANALYSIS: | SOIL/LOW | SOIL/LOW | SOIL/LOW | SOIL/LOW | SOIL/LOW | SOIL/LOW |
| DILUTION FACTOR: | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 |
| DATE SAMPLED: | 12/08/94 | 12/08/94 | 12/08/94 | 12/08/94 | 12/08/94 | 12/08/94 |
| DATE ANALYZED: | 12/11/94 | 12/11/94 | 12/11/94 | 12/11/94 | 12/11/94 | 12/11/94 |
| PERCENT SOLID: | 76 | 86 | 87 | 82 | 81 | 71 |
| VOA | | | | | | |
| Chloromethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Bromomethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Vinyl Chloride | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Chloroethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Methylene Chloride | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Acetone | 13 U | 14 U | 11 U | 12 U | 12 U | 14 U |
| Carbon Disulfide | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 1,1-Dichloroethene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 1,1-Dichloroethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 1,2-Dichloroethene (total) | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Chloroform | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 1,2-Dichloroethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 2-Butanone | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 1,1,1-Trichloroethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Carbon Tetrachloride | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Bromodichloromethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 1,2-Dichloropropane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| cis-1,3-Dichloropropene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Trichloroethene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Dibromochloromethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 1,1,2-Trichloroethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Benzene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| trans-1,3-Dichloropropene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Bromoform | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 4-Methyl-2-Pentanone | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 2-Hexanone | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Tetrachloroethene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| 1,1,2,2-Tetrachloroethane | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Toluene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Chlorobenzene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Ethylbenzene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Styrene | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |
| Xylene (total) | 13 U | 12 U | 11 U | 12 U | 12 U | 14 U |

FILENAME: AHZ73.SDG DATE: 01/17/95 TIME: 15:29 CADRE 1.92

Water units are reported in ug/L.
Soil units are reported in ug/Kg.

| EPA SAMPLE NUMBER: | AH275 | AH276 | AH277 | AH278 | AH279 | AH280 |
|------------------------------|----------------|----------------|----------------|----------------|----------------|----------------|
| SAMPLE LOCATION: | SS-01 | SS-02 | SS-03 | SS-04 | SD-01 | SD-02 |
| LABORATORY SAMPLE NUMBER: | 956601 | 956604 | 956605 | 956606 | 956607 | 956608 |
| SAMPLE TYPE: | Routine Sample | Routine Sample | Routine Sample | Routine Sample | Routine Sample | Routine Sample |
| MATRIX/ANALYSIS: | SOIL/LOW | SOIL/LOW | SOIL/LOW | SOIL/LOW | SOIL/LOW | SOIL/LOW |
| DILUTION FACTOR: | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 |
| DATE SAMPLED: | 12/08/94 | 12/08/94 | 12/08/94 | 12/08/94 | 12/08/94 | 12/08/94 |
| DATE EXTRACTED: | 12/09/94 | 12/09/94 | 12/09/94 | 12/09/94 | 12/09/94 | 12/09/94 |
| DATE ANALYZED: | 12/20/94 | 12/20/94 | 12/20/94 | 12/20/94 | 12/21/94 | 12/21/94 |
| PERCENT SOLID: | 81 | 86 | 72 | 73 | 75 | 78 |
| BNA | | | | | | |
| Phenol | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| bis(2-Chloroethyl) ether | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2-Chlorophenol | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 1,3-Dichlorobenzene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 1,4-Dichlorobenzene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 1,2-Dichlorobenzene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2-Methylphenol | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2,2'-oxybis(1-Chloropropane) | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 4-Methylphenol | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| N-Nitroso-di-n-propylamine | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Hexachloroethane | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Nitrobenzene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Isophorone | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2-Nitrophenol | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2,4-Dimethylphenol | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| bis(2-Chloroethoxy) methane | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2,4-Dichlorophenol | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 1,2,4-Trichlorobenzene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Naphthalene | 410 U | 110 J | 460 U | 450 U | 440 U | 420 U |
| 4-Chloroaniline | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Hexachlorobutadiene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 4-Chloro-3-methylphenol | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2-Methylnaphthalene | 410 U | 99 J | 460 U | 450 U | 440 U | 420 U |
| Hexachlorocyclopentadiene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2,4,6-Trichlorophenol | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2,4,5-Trichlorophenol | 990 U | 930 U | 1100 U | 1100 U | 1100 U | 1000 U |
| 2-Chloronaphthalene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2-Nitroaniline | 990 U | 930 U | 1100 U | 1100 U | 1100 U | 1000 U |
| Dimethylphthalate | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Acenaphthylene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2,6-Dinitrotoluene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 3-Nitroaniline | 990 U | 930 U | 1100 U | 1100 U | 1100 U | 1000 U |
| Acenaphthene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2,4-Dinitrophenol | 990 U | 930 U | 1100 U | 1100 U | 1100 U | 1000 U |
| 4-Nitrophenol | 990 U | 930 U | 1100 U | 1100 U | 1100 U | 1000 U |
| Dibenzofuran | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 2,4-Dinitrotoluene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Diethylphthalate | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 4-Chlorophenyl-phenyl ether | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Fluorene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 4-Nitroaniline | 990 U | 930 U | 1100 U | 1100 U | 1100 U | 1000 U |
| 4,6-Dinitro-2-methylphenol | 990 U | 930 U | 1100 U | 1100 U | 1100 U | 1000 U |
| N-nitrosodiphenylamine | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 4-Bromophenyl-phenylether | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Hexachlorobenzene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Pentachlorophenol | 990 U | 930 U | 1100 U | 1100 U | 1100 U | 1000 U |
| Phenanthrene | 410 U | 150 J | 460 U | 140 J | 310 J | 420 U |
| Anthracene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Carbazole | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Di-n-butylphthalate | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Fluoranthene | 410 U | 92 J | 460 U | 350 J | 410 J | 420 U |
| Pyrene | 410 U | 380 U | 460 U | 330 J | 340 J | 35 J |
| Butylbenzylphthalate | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| 3,3'-Dichlorobenzidine | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Benzo(a)anthracene | 410 U | 380 U | 460 U | 100 J | 170 J | 420 U |
| Chrysene | 410 U | 110 J | 460 U | 100 J | 210 J | 420 U |
| bis(2-Ethylhexyl)phthalate | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Di-n-octylphthalate | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Benzo(b)fluoranthene | 410 U | 150 J | 460 U | 450 U | 150 J | 420 U |
| Benzo(k)fluoranthene | 410 U | 380 U | 460 U | 450 U | 180 J | 420 U |
| Benzo(a)pyrene | 410 U | 380 U | 460 U | 450 U | 190 J | 420 U |
| Indeno(1,2,3-cd)pyrene | 410 U | 380 U | 460 U | 450 U | 110 J | 420 U |
| Dibenz(a,h)anthracene | 410 U | 380 U | 460 U | 450 U | 440 U | 420 U |
| Benzo(g,h,i)perylene | 410 U | 380 U | 460 U | 450 U | 110 J | 420 U |

FILENAME: AHZ73.SDG DATE: 01/17/95 TIME: 15:27 CADRE 1.92

Water units are reported in ug/L.
Soil units are reported in ug/Kg.

| EPA SAMPLE NUMBER: SAMPLE LOCATION: LABORATORY SAMPLE NUMBER: SAMPLE TYPE: MATRIX/ANALYSIS: DILUTION FACTOR: DATE SAMPLED: DATE EXTRACTED: DATE ANALYZED: PERCENT SOLID: | AH281 SD-03 956609 Routine Sample SOIL/LOW 1.0 12/08/94 12/09/94 12/20/94 76 | AH282 SD-04 956610 Routine Sample SOIL/LOW 1.0 12/08/94 12/09/94 12/21/94 86 | AH283 SD-05 956611 Routine Sample SOIL/LOW 1.0 12/08/94 12/09/94 12/21/94 87 | AH284 SD-06 956612 Routine Sample SOIL/LOW 1.0 12/08/94 12/09/94 12/21/94 82 | AH285 SD-07 956613 Routine Sample SOIL/LOW 1.0 12/08/94 12/09/94 12/21/94 81 | AH286 SD-08 956614 Routine Sample SOIL/LOW 1.0 12/08/94 12/09/94 01/10/95 71 |
|---|---|---|---|---|---|---|
| BNA | | | | | | |
| Phenol | 430 | 380 | 380 | 400 | 410 | 460 |
| bis(2-Chloroethyl) ether | 430 | 380 | 380 | 400 | 410 | 460 |
| 2-Chlorophenol | 430 | 380 | 380 | 400 | 410 | 460 |
| 1,3-Dichlorobenzene | 430 | 380 | 380 | 400 | 410 | 460 |
| 1,4-Dichlorobenzene | 430 | 380 | 380 | 400 | 410 | 460 |
| 1,2-Dichlorobenzene | 430 | 380 | 380 | 400 | 410 | 460 |
| 2-Methylphenol | 430 | 380 | 380 | 400 | 410 | 460 |
| 2,2'-oxybis(1-Chloropropane) | 430 | 380 | 380 | 400 | 410 | 460 |
| 4-Methylphenol | 430 | 380 | 380 | 400 | 410 | 460 |
| N-Nitroso-di-n-propylamine | 96 | 380 | 380 | 400 | 410 | 460 |
| Hexachloroethane | 430 | 380 | 380 | 400 | 410 | 460 |
| Nitrobenzene | 430 | 380 | 380 | 400 | 410 | 460 |
| Isophorone | 430 | 380 | 380 | 400 | 410 | 460 |
| 2-Nitrophenol | 430 | 380 | 380 | 400 | 410 | 460 |
| 2,4-Dimethylphenol | 430 | 380 | 380 | 400 | 410 | 460 |
| bis(2-Chloroethoxy) methane | 430 | 380 | 380 | 400 | 410 | 460 |
| 2,4-Dichlorophenol | 430 | 380 | 380 | 400 | 410 | 460 |
| 1,2,4-Trichlorobenzene | 430 | 380 | 380 | 400 | 410 | 460 |
| Naphthalene | 430 | 380 | 380 | 400 | 410 | 460 |
| 4-Chloroaniline | 430 | 380 | 380 | 400 | 410 | 460 |
| Hexachlorobutadiene | 430 | 380 | 380 | 400 | 410 | 460 |
| 4-Chloro-3-methylphenol | 91 | 380 | 380 | 400 | 410 | 460 |
| 2-Methylnaphthalene | 430 | 380 | 380 | 400 | 410 | 460 |
| Hexachlorocyclopentadiene | 430 | 380 | 380 | 400 | 410 | 460 |
| 2,4,6-Trichlorophenol | 430 | 380 | 380 | 400 | 410 | 460 |
| 2,4,5-Trichlorophenol | 1000 | 930 | 920 | 980 | 980 | 1100 |
| 2-Chloronaphthalene | 430 | 380 | 380 | 400 | 410 | 460 |
| 2-Nitroaniline | 1000 | 930 | 920 | 980 | 980 | 1100 |
| Dimethylphthalate | 430 | 380 | 380 | 400 | 410 | 460 |
| Acenaphthylene | 430 | 380 | 380 | 400 | 410 | 460 |
| 2,6-Dinitrotoluene | 430 | 380 | 380 | 400 | 410 | 460 |
| 3-Nitroaniline | 1000 | 930 | 920 | 980 | 980 | 1100 |
| Acenaphthene | 430 | 380 | 380 | 400 | 410 | 460 |
| 2,4-Dinitrophenol | 1000 | 930 | 920 | 980 | 980 | 1100 |
| 4-Nitrophenol | 1000 | 930 | 920 | 980 | 980 | 1100 |
| Dibenzofuran | 430 | 380 | 380 | 400 | 410 | 460 |
| 2,4-Dinitrotoluene | 430 | 380 | 380 | 400 | 410 | 460 |
| Diethylphthalate | 430 | 380 | 380 | 400 | 410 | 460 |
| 4-Chlorophenyl-phenyl ether | 430 | 380 | 380 | 400 | 410 | 460 |
| Fluorene | 430 | 380 | 380 | 400 | 410 | 460 |
| 4-Nitroaniline | 1000 | 930 | 920 | 980 | 980 | 1100 |
| 4,6-Dinitro-2-methylphenol | 1000 | 930 | 920 | 980 | 980 | 1100 |
| N-nitrosodiphenylamine | 430 | 380 | 380 | 400 | 410 | 460 |
| 4-Bromophenyl-phenylether | 430 | 380 | 380 | 400 | 410 | 460 |
| Hexachlorobenzene | 430 | 380 | 380 | 400 | 410 | 460 |
| Pentachlorophenol | 1000 | 930 | 920 | 980 | 980 | 1100 |
| Phenanthrene | 430 | 380 | 380 | 400 | 410 | 460 |
| Anthracene | 430 | 380 | 380 | 400 | 410 | 460 |
| Carbazole | 430 | 380 | 380 | 400 | 410 | 460 |
| Di-n-butylphthalate | 430 | 380 | 380 | 400 | 410 | 460 |
| Fluoranthene | 430 | 380 | 380 | 400 | 410 | 460 |
| Pyrene | 140 | 380 | 380 | 400 | 410 | 460 |
| Butylbenzylphthalate | 430 | 380 | 44 | 23 | 65 | 460 |
| 3,3'-Dichlorobenzidine | 430 | 380 | 380 | 400 | 410 | 460 |
| Benzo(a)anthracene | 430 | 380 | 380 | 400 | 410 | 460 |
| Chrysene | 430 | 380 | 380 | 400 | 410 | 460 |
| bis(2-Ethylhexyl)phthalate | 430 | 380 | 380 | 400 | 410 | 460 |
| Di-n-octylphthalate | 430 | 380 | 380 | 400 | 410 | 35 |
| Benzo(b)fluoranthene | 430 | 380 | 380 | 400 | 410 | 460 |
| Benzo(k)fluoranthene | 430 | 380 | 380 | 400 | 410 | 460 |
| Benzo(a)pyrene | 430 | 380 | 380 | 400 | 410 | 460 |
| Indeno(1,2,3-cd)pyrene | 430 | 380 | 380 | 400 | 410 | 460 |
| Dibenz(a,h)anthracene | 430 | 380 | 380 | 400 | 410 | 460 |
| Benzo(g,h,i)perylene | 430 | 380 | 380 | 400 | 410 | 460 |

FILENAME: AHZ73.SDG DATE: 01/17/95 TIME: 15:27 CADRE 1.92

Water units are reported in ug/L.
Soil units are reported in ug/Kg.

Site: St. Johnsbury Dump
 Laboratory: American Analytical & Technical Services
 Disk: 6101012-DV08
 File: 23023PSR.WK4

CLP PESTICIDE/PCB ORGANIC ANALYSIS
 CASE 23023, SDG AHZ73
 SOIL ANALYTICAL RESULTS (ug/kg)

Table III Page 8 of 9

| Sample Location | SS-01 | SS-02 | SS-03 | SS-04 | SD-01 | SD-02 | SD-03 | SD-04 | SD-05 | SD-06 |
|------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Traffic Report Number | AH275 | AH276 | AH277 | AH278 | AH279 | AH280 | AH281 | AH282 | AH283 | AH284 |
| Remarks | | | | DUP AH277 | | | | | DUP AH282 | |
| Sampling Date | 07-Dec-94 | 07-Dec-94 | 07-Dec-94 | 07-Dec-94 | 07-Dec-94 | 07-Dec-94 | 07-Dec-94 | 07-Dec-94 | 07-Dec-94 | 07-Dec-94 |
| Extraction Date | 09-Dec-94 | 09-Dec-94 | 09-Dec-94 | 09-Dec-94 | 09-Dec-94 | 09-Dec-94 | 09-Dec-94 | 09-Dec-94 | 09-Dec-94 | 09-Dec-94 |
| Analysis Date | 21-Dec-94 | 21-Dec-94 | 21-Dec-94 | 21-Dec-94 | 21-Dec-94 | 21-Dec-94 | 21-Dec-94 | 21-Dec-94 | 21-Dec-94 | 21-Dec-94 |
| Dilution Factor | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 |
| Percent Solid | 81.0% | 86.0% | 72.0% | 73.0% | 75.0% | 78.0% | 76.0% | 86.0% | 87.0% | 82.0% |
| PESTICIDE/PCB COMPOUND | | | | | | | | | | |
| alpha-BHC | 2.1 U | 2.0 U | 2.4 U | 2.3 U | 2.3 U | 2.2 U | 2.2 U | 2.0 U | 2.0 U | 2.1 U |
| beta-BHC | 2.1 U | 2.0 U | 2.4 U | 2.3 U | 2.3 U | 2.2 U | 2.2 U | 2.0 U | 2.0 U | 2.1 U |
| delta-BHC | 2.1 U | 2.0 U | 2.4 U | 2.3 U | 2.3 U | 2.2 U | 2.2 U | 2.0 U | 2.0 U | 2.1 U |
| gamma-BHC (Lindane) | 2.1 U | 2.0 U | 2.4 U | 2.3 U | 2.3 U | 2.2 U | 2.2 U | 2.0 U | 2.0 U | 2.1 U |
| Heptachlor | 2.1 U | 2.0 U | 2.4 U | 2.3 U | 2.3 U | 2.2 U | 2.2 U | 2.0 U | 2.0 U | 2.1 U |
| Aldrin | 2.1 U | 2.0 U | 2.4 U | 2.3 U | 2.3 U | 2.2 U | 2.2 U | 2.0 U | 2.0 U | 2.1 U |
| Heptachlor epoxide | 2.1 U | 2.0 U | 2.4 U | 2.3 U | 2.3 U | 2.2 U | 2.2 U | 2.0 U | 2.0 U | 2.1 U |
| Endosulfan I | 2.1 UJ | 2.0 UJ | 2.4 UJ | 2.3 UJ | 2.3 UJ | 2.2 UJ | 2.2 UJ | 2.0 UJ | 2.0 UJ | 2.1 UJ |
| Dieldrin | 4.1 U | R | 4.6 U | 4.5 U | 4.4 U | 4.2 U | 4.3 U | 3.8 U | 3.8 U | 4.0 U |
| 4,4'-DDE | 4.1 U | 18 UJ | 4.6 U | 4.5 U | 4.4 U | 4.2 U | 4.3 U | 3.8 U | 3.8 U | 4.0 U |
| Endrin | 4.1 U | 10 J | 4.6 U | 4.5 U | 4.4 U | 4.2 U | 4.3 U | 3.8 U | 3.8 U | 4.0 U |
| Endosulfan II | 4.1 U | 3.8 U | 4.6 U | 4.5 U | 4.4 U | 4.2 U | 4.3 U | 3.8 U | 3.8 U | 4.0 U |
| 4,4'-DDD | 4.1 U | 3.8 U | 4.6 U | 4.5 U | 4.4 U | 4.2 U | 4.3 U | 3.8 U | 3.8 U | 4.0 U |
| Endosulfan sulfate | 4.1 U | 3.8 U | 4.6 U | 4.5 U | 4.4 U | 4.2 U | 4.3 U | 3.8 U | 3.8 U | 4.0 U |
| 4,4'-DDT | 4.1 U | R | 4.6 U | 4.5 U | 4.4 U | 4.2 U | 4.3 U | 3.8 U | 3.8 U | 4.0 U |
| Methoxychlor | 21 U | 20 U | 24 U | 23 U | 23 U | 22 U | 22 U | 20 U | 20 U | 21 U |
| Endrin ketone | 4.1 U | 3.8 U | 4.6 U | 4.5 U | 4.4 U | 4.2 U | 4.3 U | 3.8 U | 3.8 U | 4.0 U |
| Endrin aldehyde | 4.1 U | R | 4.6 U | 4.5 U | 4.4 U | 4.2 U | 4.3 U | 3.8 U | 3.8 U | 4.0 U |
| alpha-Chlordane | 2.1 U | R | 2.4 U | 2.3 U | 2.3 U | 2.2 U | 2.2 U | 2.0 U | 2.0 U | 2.1 U |
| gamma-Chlordane | 2.1 U | R | 2.4 U | 2.3 U | 2.3 U | 2.2 U | 2.2 U | R | 2.0 U | 2.1 U |
| Toxaphene | 210 U | 200 U | 240 U | 230 U | 230 U | 220 U | 220 U | 200 U | 200 U | 210 U |
| Aroclor-1016 | 41 U | 38 U | 46 U | 45 U | 44 U | 42 U | 43 U | 38 U | 38 U | 40 U |
| Aroclor-1221 | 83 U | 77 U | 93 U | 92 U | 89 U | 86 U | 88 U | 77 U | 77 U | 82 U |
| Aroclor-1232 | 41 U | 38 U | 46 U | 45 U | 44 U | 42 U | 43 U | 38 U | 38 U | 40 U |
| Aroclor-1242 | 41 U | 38 U | 46 U | 45 U | 44 U | 42 U | 43 U | 38 U | 38 U | 40 U |
| Aroclor-1248 | 41 U | 38 U | 46 U | 45 U | 44 U | 42 U | 43 U | 38 U | 38 U | 40 U |
| Aroclor-1254 | 41 U | 430 J | 46 U | 45 U | 44 U | 42 U | 43 U | 38 U | 38 U | 40 U |
| Aroclor-1260 | 41 U | 38 U | 46 U | 45 U | 44 U | 42 U | 43 U | 67 J | 38 UJ | 40 U |

Sample results are reported on dry weight basis.
 J - The associated numerical value is an estimated quantity.
 U - The compound was not detected. The associated numerical value is the compound quantitation limit.
 UJ - The compound was not detected. The compound quantitation limit is an estimated value.
 R - The datum was rejected.

Site: St. Johnsbury Dump
 Laboratory: American Analytical & Technical Services
 Disk: 6101012-DV08
 File: 23023PSR.WK4

CLP PESTICIDE/PCB ORGANIC ANALYSIS
 CASE 23023, SDG AHZ73
 SOIL ANALYTICAL RESULTS (ug/kg)

Table III Page 9 of 9

| Sample Location | SD-07 | SD-08 | | | | | | | |
|------------------------|-----------|-----------|--|--|--|--|--|--|--|
| Traffic Report Number | AHZ85 | AHZ86 | | | | | | | |
| Remarks | | | | | | | | | |
| Sampling Date | 07-Dec-94 | 07-Dec-94 | | | | | | | |
| Extraction Date | 09-Dec-94 | 09-Dec-94 | | | | | | | |
| Analysis Date | 21-Dec-94 | 21-Dec-94 | | | | | | | |
| Dilution Factor | 1.0 | 1.0 | | | | | | | |
| Percent Solid | 81.0% | 71.0% | | | | | | | |
| PESTICIDE/PCB COMPOUND | | | | | | | | | |
| alpha-BHC | 2.1 U | 2.4 U | | | | | | | |
| beta-BHC | 2.1 U | 2.4 U | | | | | | | |
| delta-BHC | 2.1 U | 2.4 U | | | | | | | |
| gamma-BHC (Lindane) | 2.1 U | 2.4 U | | | | | | | |
| Heptachlor | 2.1 U | 2.4 U | | | | | | | |
| Aldrin | 2.1 U | 2.4 U | | | | | | | |
| Heptachlor epoxide | 2.1 U | 2.4 U | | | | | | | |
| Endosulfan I | 2.1 UJ | 2.4 UJ | | | | | | | |
| Dieldrin | 4.1 U | 4.6 U | | | | | | | |
| 4,4'-DDE | 4.1 U | 4.6 U | | | | | | | |
| Endrin | 4.1 U | 4.6 U | | | | | | | |
| Endosulfan II | 4.1 U | 4.6 U | | | | | | | |
| 4,4'-DDD | 4.1 U | 4.6 U | | | | | | | |
| Endosulfan sulfate | 4.1 U | 4.6 U | | | | | | | |
| 4,4'-DDT | 4.1 U | 4.6 U | | | | | | | |
| Methoxychlor | 2.1 U | 2.4 U | | | | | | | |
| Endrin ketone | 4.1 U | 4.6 U | | | | | | | |
| Endrin aldehyde | 4.1 U | 4.6 U | | | | | | | |
| alpha-Chlordane | 2.1 U | 2.4 U | | | | | | | |
| gamma-Chlordane | 2.1 U | 2.4 U | | | | | | | |
| Toxaphene | 210 U | 240 U | | | | | | | |
| Aroclor-1016 | 41 U | 46 U | | | | | | | |
| Aroclor-1221 | 83 U | 94 U | | | | | | | |
| Aroclor-1232 | 41 U | 46 U | | | | | | | |
| Aroclor-1242 | 41 U | 46 U | | | | | | | |
| Aroclor-1248 | 41 U | 46 U | | | | | | | |
| Aroclor-1254 | 41 U | 46 U | | | | | | | |
| Aroclor-1260 | 41 U | 46 U | | | | | | | |

Sample results are reported on dry weight basis.
 J - The associated numerical value is an estimated quantity.
 U - The compound was not detected. The associated numerical value is the compound quantitation limit.
 UJ - The compound was not detected. The compound quantitation limit is an estimated value.
 R - The datum was rejected.

ATTACHMENT B

St. Johnsbury Dump

**Inorganic Analytical Results and Sample Detection Limits
CDM Federal Programs Corporation**

December 7, 1994

Site: SI Johnsbury Dump
 Laboratory: American Analytical Technical Services - LA
 Disk: 7710023-DV08
 File: 23023MSR.WK4

CLP INORGANIC ANALYSIS
 CASE 23023, SDG MAFX75
 SOIL ANALYTICAL RESULTS (mg/Kg)

Table II Page 2 of 3

| Sample Location | | SS-01 | SS-02 | SS-03 | SS-04 | SD-01 | SD-02 | SD-03 | SD-04 | SD-05 |
|-----------------------|----|----------|----------|----------|------------|----------|----------|----------|----------|------------|
| Traffic Report Number | | MAFX75 | MAFX76 | MAFX77 | MAFX78 | MAFX79 | MAFX80 | MAFX81 | MAFX82 | MAFX83 |
| Remarks | | | | | DUP MAFX77 | | | | | DUP MAFX82 |
| Sampling Date | | 12/07/94 | 12/07/94 | 12/07/94 | 12/07/94 | 12/07/94 | 12/07/94 | 12/07/94 | 12/07/94 | 12/07/94 |
| Percent Solid | | 81.5% | 87.2% | 72.7% | 78.1% | 69.4% | 75.7% | 69.2% | 83.1% | 84.4% |
| Dilution Factor | | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 |
| INORGANIC ANALYTES | | | | | | | | | | |
| Aluminum | P | 10700 | 6270 | 9790 | 8220 | 8220 | 8070 | 9480 | 4710 | 5720 |
| Antimony | P | 2.9 UJ | 3.9 J | 3.3 UJ | 3.2 UJ | 3.5 UJ | 3.2 UJ | 3.5 UJ | 2.9 UJ | 2.8 UJ |
| Arsenic | P | 1.3 J | 5.4 | 4.2 | 1.0 U | 1.1 U | 1.0 U | 1.1 U | 0.94 U | 0.92 U |
| Barium | P | 31.1 | 124 | 56.1 | 45.9 | 71.3 | 35.7 | 37.2 | 18.3 | 23.5 |
| Beryllium | P | 0.20 | 0.31 | 0.18 | 0.14 J | 0.09 U | 0.08 U | 0.09 U | 0.07 U | 0.07 U |
| Cadmium | P | 0.98 J | 3.5 J | 1.1 J | 1.7 J | 1.1 U | 1.0 U | 1.1 U | 0.91 U | 0.9 U |
| Calcium | P | 2520 | 12100 | 35000 | 26300 | 14600 J | 11500 J | 12200 J | 78500 J | 9210 J |
| Chromium | P | 21.3 J | 55.1 J | 19.5 J | 16.7 J | 20.8 J | 17.9 J | 21.2 J | 9.9 J | 14.0 J |
| Cobalt | P | 7.8 | 6.5 J | 8.7 | 7.9 | 4.7 | 4.8 | 5.2 | 2.2 J | 3.2 |
| Copper | P | 16.9 | 542 | 29.2 | 24.8 | 27.0 J | 17.5 J | 21.5 J | 6.8 UJ | 26.1 J |
| Iron | P | 17200 | 47500 | 19300 | 16900 | 13400 | 11900 | 13700 | 10700 | 10100 |
| Lead | P | 7.7 | 255 | 16.1 | 13.2 | 173 J | 12.2 J | 10.2 J | 5.7 J | 10.6 J |
| Magnesium | P | 5540 | 1500 | 10500 | 8500 | 5040 J | 4950 J | 5910 J | 6270 J | 3080 J |
| Manganese | P | 560 J | 1070 J | 498 J | 426 J | 498 J | 369 J | 275 J | 624 J | 276 J |
| Mercury | CV | 0.12 U | 0.11 U | 0.14 U | 0.13 U | 0.14 U | 0.13 U | 0.14 U | 0.12 U | 0.12 U |
| Nickel | P | 30.6 | 79.6 | 31.0 | 27.5 | 25.9 | 18.2 | 21.5 | 8.4 J | 11.0 |
| Potassium | P | 1140 | 699 | 2860 | 2200 | 1530 | 1320 | 1570 | 847 | 1000 |
| Selenium | P | 0.91 U | 0.85 U | 1.0 U | 0.97 U | 1.1 U | 0.98 U | 1.1 U | 0.89 U | 0.88 U |
| Silver | P | 0.49 U | 0.46 UJ | 0.55 U | 0.53 U | 0.58 U | 0.53 U | 0.58 U | 0.48 UJ | 0.47 U |
| Sodium | P | 225 U | 194 UJ | 468 U | 322 U | 387 U | 437 U | 578 U | 321 UJ | 266 U |
| Thallium | P | 1.3 UJ | 1.2 UJ | 1.5 UJ | 1.4 UJ | 1.6 UJ | 1.4 UJ | 1.6 UJ | 1.3 UJ | 1.3 UJ |
| Vanadium | P | 20.4 | 15.8 | 20.9 | 17.8 | 21.8 | 18.0 | 18.4 | 11.1 | 11.8 |
| Zinc | P | 38.0 | 260 | 58.9 | 52.0 | 115 | 80.9 | 48.5 | 24.5 U | 30.8 |
| Cyanide | CA | 0.61 U | 0.57 U | 0.88 U | 0.86 U | 0.72 U | 0.65 U | 0.72 U | 0.60 U | 0.72 |

Analytical Method

P ICP

CV Cold Vapor

CA Midi - Distillation

Spectrophotometric
 Analysis

Sample Results are reported on dry weight basis.

J - The associated numerical value is an estimated quantity.

U - The analyte was not detected. The associated numerical value is the analyte detection limit.

UJ - The analyte was not detected. The analyte detection limit is an estimated value.

Site: St. Johnsbury Dump
 Laboratory: American Analytical Technical Services - LA
 Disk: 771D023-DV08
 File: 23023MSR.WK4

CLP INORGANIC ANALYSIS
 CASE 23023, SDG MAFX75
 SOIL ANALYTICAL RESULTS (mg/Kg)

Table II Page 3 of 3

| Sample Location | | SD-06 | SD-07 | SD-08 | | | | | | |
|-----------------------|----|----------|----------|----------|--|--|--|--|--|--|
| Traffic Report Number | | MAFX84 | MAFX85 | MAFX86 | | | | | | |
| Remarks | | | | | | | | | | |
| Sampling Date | | 12/07/94 | 12/07/94 | 12/07/94 | | | | | | |
| Percent Solid | | 79.8% | 77.2% | 68.0% | | | | | | |
| Dilution Factor | | 1.0 | 1.0 | 1.0 | | | | | | |
| INORGANIC ANALYTES | | | | | | | | | | |
| Aluminum | P | 7850 | 7390 | 8070 | | | | | | |
| Antimony | P | 3.0 UJ | 3.1 UJ | 3.5 UJ | | | | | | |
| Arsenic | P | 0.88 U | 1.0 U | 1.1 U | | | | | | |
| Barium | P | 39.9 | 28.7 | 34.8 | | | | | | |
| Beryllium | P | 0.08 U | 0.08 U | 0.09 U | | | | | | |
| Cadmium | P | 0.95 U | 0.98 U | 1.1 U | | | | | | |
| Calcium | P | 13100 J | 8390 J | 9430 J | | | | | | |
| Chromium | P | 19.1 J | 16.9 J | 19.2 J | | | | | | |
| Cobalt | P | 4.6 | 4.4 | 5.3 | | | | | | |
| Copper | P | 12.9 J | 12.5 J | 25.1 J | | | | | | |
| Iron | P | 11900 | 10800 | 11400 | | | | | | |
| Lead | P | 7.7 J | 7.5 J | 11.6 J | | | | | | |
| Magnesium | P | 5150 J | 4780 J | 4880 J | | | | | | |
| Manganese | P | 390 J | 285 J | 457 J | | | | | | |
| Mercury | CV | 0.13 U | 0.13 U | 0.23 J | | | | | | |
| Nickel | P | 17.2 | 14.2 | 19.5 | | | | | | |
| Potassium | P | 1660 | 1430 | 1180 | | | | | | |
| Selenium | P | 0.93 U | 0.96 U | 1.1 U | | | | | | |
| Silver | P | 0.50 U | 0.52 U | 0.59 U | | | | | | |
| Sodium | P | 260 U | 283 U | 296 U | | | | | | |
| Thallium | P | 1.4 UJ | 1.4 UJ | 1.8 UJ | | | | | | |
| Vanadium | P | 16.4 | 15.1 | 16.2 | | | | | | |
| Zinc | P | 43.6 | 36.5 | 53.4 | | | | | | |
| Cyanide | CA | 0.83 U | 0.65 U | 0.74 U | | | | | | |

Analytical Method

P ICP

CV Cold Vapor

CA Midi - Distillation

Spectrophotometric
 Analysis

Sample Results are reported on dry weight basis.

J - The associated numerical value is an estimated quantity.

U - The analyte was not detected. The associated numerical value is the analyte detection limit.

UJ - The analyte was not detected. The analyte detection limit is an estimated value.